UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

ZAQUANNA ALBERT, individually, ZAQUANNA ALBERT, as the parent and natural guardian of Z.I., a minor, and ZAQUANNA ALBERT, as parent and natural guardian of Z.S., a minor,

NOTICE OF MOTION

17-cv-3957 (ARR) (SMG)

Plaintiffs.

-against-

CITY OF NEW YORK; POLICE OFFICER WAYNE ISAACS; DETECTIVE JOSEPH SOLOMON; and DETECTIVE PAUL PERODIN,

Defendants.

PLEASE TAKE NOTICE, that upon the Declaration of David B. Rankin, dated March 27, 2020, and the exhibits annexed thereto, and upon all the papers and proceedings had herein, plaintiff Zaquanna Albert will move this Court, before the Honorable Steven M. Gold, at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza E, Brooklyn, NY 11201, on a date and at a time to be designated by the Court, for an Order pursuant to Local Civil Rule 83.2(a) granting plaintiff Zaquanna Albert's application for an infant compromise on behalf of her minor child Z.S., and awarding her such other and further relief as the Court may deem just and proper.

Dated: July 9, 2020

New York, New York

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN, LLP 99 Park Avenue, PH/26th Floor New York, New York 10016

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